

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

MIDLAND FUNDING LLC

Plaintiff/Counterclaim Defendant,
vs.

ANDREA L. BRENT

Defendant/Counterclaim Plaintiff
vs.

**MIDLAND CREDIT MANAGEMENT,
INC.**

Counterclaim Defendant

Case No. 3:08-CV-1434

Judge David A. Katz

**UNOPPOSED MOTION TO EXTEND
REPLY DEADLINE**

Defendant, Andrea Brent, hereby moves this Court for an Order extending the deadline for the submission of her Reply to Midland Funding LLC and Midland Credit Management, Inc.'s Opposition to Brent's Motion for Leave to File a Third Amended Counterclaim. Midland's Opposition was filed electronically with this Court on December 28, 2009. Pursuant to Loc. R. 7.1(e) Brent's Reply in Support of her motion should be filed by January 11, 2010.

Due to the complex nature of the issues raised in Midland's Opposition brief and the extraordinary press of business at this point in time, additional time is required to prepare an appropriate Reply for this Court's consideration. Brent requests an additional twenty-one day extension of time in which to respond, until on or before February 1, 2010.

Counsel for the Midland entities has been contacted and consents to this extension. The undersigned certifies that this Motion is not made for purposes of delay and that the requested extension will not prejudice the parties.

Respectfully submitted,

/s/Dennis E. Murray, Sr.

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CERTIFICATION

This is to certify that a copy of the foregoing **Unopposed Motion to Expend Reply Deadline** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic system. Parties may access the filing through the Court's system on this 8th day of January, 2010.

/s/Dennis E. Murray, Sr.

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Attorneys for Defendant/Counterclaim Plaintiff